

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

2012 JUN -6 PM 3:50

JP

UNITED STATES OF AMERICA,

§

SEALED

Plaintiff,

§

Criminal No. EP-12-CR-_____

§

v.

§

I N D I C T M E N T

§

CHARLES MARQUEZ,

§

COUNT 1: 18 U.S.C. § 1591(a) - Sex

aka El Gordo,

§

Trafficking of Children and 18 U.S.C. § 2

aka Puerkote,

§

Aiding & Abetting

aka Henry,

§

aka Paul,

§

COUNT 2: 18 U.S.C. § 2421

aka Pablo,

§

Transportation for Prostitution

aka Carlos Marquez, and

§

MARTHA JIMENEZ SANCHEZ,

§

COUNT 3: 18 U.S.C. § 2422(a) - Coercion
and Enticement

Defendants.

§

§

COUNT 4: 18 U.S.C. § 371 -

§

Conspiracy/Coercion and Enticement

§

§

COUNT 5: 8 U.S.C. § 1328 - Importation
of Alien for Immoral Purpose

§

§

THE GRAND JURY CHARGES:

EP 12CR1351COUNT ONE

(18 U.S.C. § 1591(a) and § 2)

(Sex Trafficking of Children and Aiding and Abetting)

Beginning on or about October 1, 2011 and continuing through on or about December 18,
2011, in the Western District of Texas and elsewhere, Defendants,

CHARLES MARQUEZ,

aka El Gordo,

aka Puerkote,

aka Henry,

aka Paul,

aka Pablo,

aka Carlos Marquez, and

MARTHA JIMENEZ SANCHEZ

aided and abetted by each other and by others known and unknown to the grand jury, did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain a person, knowing and in reckless disregard of the fact that the person, C.V.C., had not attained the age of eighteen years (18) and knowing that C.V.C. would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States Code, Section 1591(a)(1).

COUNT TWO

(18 U.S.C. § 2421)

(Transportation for Prostitution)

Beginning on or about January 31, 2011 and continuing through on or about March 21, 2011, in the Western District of Texas and elsewhere, Defendant,

MARTHA JIMENEZ SANCHEZ

did knowingly transport an individual, H.C.P., in interstate and foreign commerce with intent that such individual engage in prostitution, in violation of Title 18, United States Code, Section 2421.

COUNT THREE

(18 U.S.C. § 2422(a))

(Coercion and Enticement)

Beginning on or about August 17, 2007 and continuing through on or about February 29, 2012, in the Western District of Texas and elsewhere, Defendant,

CHARLES MARQUEZ

aka El Gordo,

aka Puerkote,

aka Henry,

aka Paul,

aka Pablo,

aka Carlos Marquez

did knowingly persuade, induce, and entice and attempt to persuade, induce and entice, H.C.P., among others, to travel in interstate and foreign commerce to engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2422(a).

COUNT FOUR
(18 U.S.C. § 371)
(Conspiracy/Coercion and Enticement)

Beginning on or about August 17, 2007 and continuing through on or about February 29, 2012, in the Western District of Texas and elsewhere, Defendants,

CHARLES MARQUEZ,
aka El Gordo,
aka Puerkote,
aka Henry,
aka Paul,
aka Pablo,
aka Carlos Marquez, and
MARTHA JIMENEZ SANCHEZ

together with others, knowingly conspired, combined, confederated and agreed with each other and others known and unknown to the Grand Jury, to commit certain offenses and violate certain laws of the United States, to wit: to knowingly persuade, induce, and entice and attempt to persuade, induce, and entice, H.C.P., among others, to travel in interstate and foreign commerce to engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2422(a).

MANNER AND MEANS

It was part of the conspiracy that the co-conspirators would place advertisements in a newspaper that was circulated in Ciudad Juarez, Mexico. These advertisements would offer jobs in the United States. The purpose of these advertisements was to recruit women from Mexico to

engage in various acts of prostitution in El Paso, Texas. Once recruited, the women, including but not limited to H.C.P., engaged in prostitution at the behest of the co-conspirators.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the defendants and their co-conspirators committed and caused to be committed the following overt acts in the Western District of Texas and elsewhere:

Overt Act 1:

On or about August 17, 2007 continuing through on or about February 29, 2012, CHARLES MARQUEZ placed advertisements in the El Diario de Juarez, a newspaper circulated in Ciudad Juarez, Mexico, soliciting women in Mexico to work for him. These advertisements would be for legitimate employment as well as “discreet services.”

Overt Act 2:

In or about April 2010, H.C.P. met CHARLES MARQUEZ after responding to one of CHARLES MARQUEZ’s advertisements in the El Diario de Juarez newspaper. H.C.P., who resided in Mexico, met with CHARLES MARQUEZ in the United States to discuss employment. Though H.C.P. responded to an advertisement soliciting a caretaker, CHARLES MARQUEZ informed H.C.P. that she would be working making sex videos for him. Eventually, CHARLES MARQUEZ ordered H.C.P. to work as a prostitute for him.

Overt Act 3:

In or about December 2010, H.C.P. attempted to stop working as a prostitute for CHARLES MARQUEZ. MARTHA JIMENEZ SANCHEZ traveled to H.C.P.’s home in Ciudad Juarez, Mexico and informed H.C.P. that she was to return to work. MARTHA JIMENEZ SANCHEZ told H.C.P. that if she did not return to work, H.C.P. would see CHARLES MARQUEZ’S “bad side.”

Overt Act 4:

On or about January 31, 2011 and continuing through on or about March 21, 2011, MARTHA JIMENEZ SANCHEZ transported H.C.P. from Ciudad Juarez, Mexico to El Paso, Texas. The purpose of MARTHA JIMENEZ SANCHEZ's transportation was so H.C.P. could work as a prostitute for CHARLES MARQUEZ.

COUNT FIVE
(8 U.S.C. § 1328)
(Importation of Alien for Immoral Purpose)

Beginning on or about April 1, 2010 and continuing through on or about August 31, 2011, in the Western District of Texas and elsewhere, Defendants,

CHARLES MARQUEZ,
aka El Gordo,
aka Puerkote,
aka Henry,
aka Paul,
aka Pablo,
aka Carlos Marquez, and
MARTHA JIMENEZ SANCHEZ

did knowingly import and attempt to import into the United States an alien, H.C.P., for the purpose of prostitution, and did knowingly keep, maintain, control, support, employ, and harbor an alien, H.C.P., in pursuance of the importation of said alien into the United States for the purpose of prostitution; in violation of Title 8, United States Code, Section 1328.

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

1. Upon conviction of the offense alleged in Count One of this Indictment, Defendants,

CHARLES MARQUEZ,
aka El Gordo,
aka Puerkote,
aka Henry,
aka Paul,
aka Pablo,

**aka Carlos Marquez, and
MARTHA JIMENEZ SANCHEZ,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 1594(d), any and all property, real and personal, that was used or intended to be used to commit or to facilitate the commission of the offense, and any property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense, including but not limited to a sum of money in United States currency representing the amount of proceeds obtained as a result of the offense, for which the defendants are jointly and severally liable.

2. Upon conviction of one or more of the offenses alleged in Counts Two, Three, and Four of this Indictment, Defendants,

**CHARLES MARQUEZ,
aka El Gordo,
aka Puerkote,
aka Henry,
aka Paul,
aka Pablo,
aka Carlos Marquez, and
MARTHA JIMENEZ SANCHEZ,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 2428(a), any and all property, real and personal, that was used or intended to be used to commit or to facilitate the commission of the offenses, and any and all property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds obtained as a result of the offenses, for which the defendants are jointly and severally liable.

3. Upon conviction of the offense alleged in Count Five of this Indictment, Defendants,

**CHARLES MARQUEZ,
aka El Gordo,
aka Puerkote,
aka Henry,**

**aka Paul,
aka Pablo,
aka Carlos Marquez, and
MARTHA JIMENEZ SANCHEZ,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981 and 28 U.S.C. § 2461(c), any property, real and personal, which constitutes or was derived from proceeds traceable to the offense, including but not limited to a sum of money in United States currency representing the amount of proceeds obtained as a result of the offense, for which the defendants are jointly and severally liable.

Substitute Assets Provision

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

**A TRIBUNAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002**

GRAND JURY FOREPERSON

**ROBERT PITMAN
United States Attorney**

By



Assistant United States Attorney